

Friday, December 17, 2021 at 10:20:29 Central Standard Time

Subject: Re: Gilbert
Date: Sunday, December 12, 2021 at 1:44:22 PM Central Standard Time
From: Darrell Downs
To: Preston Dugas, Terry M McKeever, Jacob Daniel
Attachments: image001.png, image002.png



Ok. Will do. Thanks Preston.

From: Preston Dugas <preston@pjdlawfirm.com>
Date: Sunday, December 12, 2021 at 1:42 PM
To: Darrell Downs <DDowns@soonerlaw.com>, Terry M McKeever <tmf@fyllaw.com>, Jacob Daniel <jdaniel@soonerlaw.com>
Subject: RE: Gilbert

Notice it, and we can go from there.

Preston J. Dugas III

Attorney



**1701 River Run, Suite 703
Fort Worth, TX 76107**

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Preston Dugas Law Firm, PLLC has announced the addition of two new Law Partners, Lyndsey Cheek and Vincent Circelli. The Law Firm will be officially changing its name to Dugas, Cheek & Circelli, PLLC and each employee will be operating under a new email address. **My new email address starting January 10, 2022 will be pdugas@dcclawfirm.com.** Please make a note of this for your file and starting on January 10, 2022 use this new email address for all communication and service of documents.

The information transmitted, including attachments, is intended only for the person(s) or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and destroy any copies of this information.

From: Darrell Downs <DDowns@soonerlaw.com>
Sent: Friday, December 10, 2021 2:44 PM
To: Preston Dugas <preston@pjdlawfirm.com>; Terry M McKeever <tmf@fyllaw.com>; Jacob Daniel <jdaniel@soonerlaw.com>
Subject: Re: Gilbert

Preston,

I have no objection to you and/or Terry appearing by zoom, but this is the one deposition that we need in person due to all the weather radar imaging prints. Accordingly, it appears we will need court guidance on this issue. I suggest I send you a notice for the deposition and then you file your motion for protective order so it will be placed before the court for ruling. Let me know if this is how you wish for us to proceed. Thanks.

Darrell

From: Preston Dugas <preston@pjdlawfirm.com>

Date: Thursday, December 9, 2021 at 9:09 AM

To: Darrell Downs <DDowns@soonerlaw.com>, Jacob Daniel <jdaniel@soonerlaw.com>, Paige Broyles <pbroyles@soonerlaw.com>

Cc: Terry M McKeever <tmm@fylaw.com>

Subject: RE: Gilbert

Darrell,

Please make sure to include Terry. He's actually defending the deposition and is my co-counsel on this case.

Can we agree to conduct this one deposition via Zoom and all others in person?

Lastly, I do not represent Dr. Altschule. I will be responding to any subpoena though.

Preston J. Dugas III

Attorney



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From: Darrell Downs <DDowns@soonerlaw.com>

Sent: Thursday, December 9, 2021 8:49 AM

To: Preston Dugas <preston@pjdlawfirm.com>; Jacob Daniel <jdaniel@soonerlaw.com>; Paige Broyles <pbroyles@soonerlaw.com>

Subject: Gilbert

Preston,

I need to get a subpoena out to Altschule if you are not representing him for the deposition so let me know.
Thanks.

Darrell